

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

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EMMANUEL BOYD	)	
	)	
	)	REMOVED FROM DEUEL
	)	COUNTY DISTRICT COURT
<b>Plaintiff</b>	)	CASE NO: CI 17-9
	)	
v.	)	
	)	
	)	
VALENTIN GEORGIEVSKI, AND	)	
HL MOTOR GROUP, INC.,	)	
	)	
<b>Defendants</b>	)	
	)	

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**NOTICE OF REMOVAL**

**PLEASE TAKE NOTICE**, that the Defendants, HL MOTOR GROUP, INC., by and through its attorneys, Wilson Elser Moskowitz Edelman & Dicker LLP, submit this Notice of Removal in accordance with 28 U.S.C. § 1332 and 1446, and respectfully represent as follows:

1. The Plaintiff, EMMANUEL BOYD, ("Plaintiff"), filed a Summons and Complaint in the District Court of Deuel County, Nebraska (the "State Court") dated July 7, 2017, commencing this action captioned as EMMANUEL BOYD V. VALENTIN GEORGIEVSKI AND HL MOTOR GROUP, INC. (the "Subject Action"). A true copy of the Summons and Complaint filed in the Subject Action is attached hereto as **Exhibit A**.
2. Upon information and belief, the Plaintiff resides in Hannover, Virginia. (See Complaint ¶ 2, Exhibit A.)
3. Defendant VALENTIN GEORGIEVSKI is a resident of the Province of Ontario, Canada. (See Complaint ¶ 3, Exhibit A.)

4. Defendant, HL MOTOR GROUP, INC., is a Canadian corporation with a principal place of business in the Province of Ontario, Canada.

5. Defendant, HL Motor Group, Inc., received a copy of the Summons and Complaint on or about July 20, 2017.

8. Upon information and belief, Defendant Valentin Goergievski has not been served with the summons and complaint.

9. The Plaintiff brings this action against the Defendants for personal injuries allegedly sustained from a motor vehicle accident. The Plaintiff claims he sustained severe and painful injuries to both body and mind, including full-thickness tear of the anterior supraspinatus tendon, and low back statin and posterior ligamentous hypertrophy, with medical expenses that exceed \$40,000, and loss of income in an amount of be determined. (See Complaint ¶15, 17, 9 and 20, Exhibit A).

9. Plaintiff has demanded \$750,000 in damages.

10. This Court has original jurisdiction over the subject matter of this action under the provisions of Section §1332 of Title 28 U.S.C., in that there is complete diversity between the parties and more than \$75,000.00 in controversy, exclusive of interest and costs. Pursuant to §1332 of Title 28 U.S.C., Defendant HL Motor Group, Inc. is entitled to remove the action to this Court.

11. This removal is timely as required by 28 U.S.C. §1446(b) as it is filed within 30 days of the Defendant's receipt of the Plaintiff's Complaint.

12. Pursuant to 28 U.S.C. §1446(b), consent of Defendant Valentin Goergievski is not required as upon information and belief he has not been served with the summons and complaint for this action.

13. Pursuant to 28 U.S.C. §1446(b), a true and correct copy of this Notice of Removal is being filed with the Clerk of the Court for the District Court of Deuel County, Nebraska.

14. Based on the forgoing, Defendant HL MOTOR GROUP, INC., hereby removes the action now pending in the District Court of Deuel County, Nebraska.

WHEREFORE, the Defendant, HL MOTOR GROUP, INC., hereby removes this Action from the State Court and demands a jury trial.

Respectfully submitted,

HL MOTOR GROUP, INC.

By its attorneys,

/s/ Beata Shapiro  
Beata Shapiro  
Wilson Elser LLP  
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Boston, MA 02110  
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Dated: August 10, 2017

**CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury that on August 10, 2017, the foregoing was **filed electronically** with the United States District Court for the District of Nebraska and served by first class mail upon the following:

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Deuel County Courthouse  
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*/s/ Beata Shapiro*  
Beata Shapiro